

## Privacy Policy

Effective Date: [12-12-17]

Last Updated Date: [10-30-17]

This Privacy Policy is incorporated by reference into the [Pockitapp Terms of Service and End User License Agreement](#) (the “**Terms**”). All other terms not defined in this Privacy Policy will have the meanings set forth in the Terms. The terms “**Pockitapp**,” “**we**,” “**us**,” and “**our**” include Pockit Inc. and our affiliates and subsidiaries. This Privacy Policy applies to the Pockitapp website, related mobile application and any other online services or properties owned or controlled by Pockitapp (collectively, the “**Service**”). This Privacy Policy explains how Pockitapp may collect, use, and disclose information we obtain through the Service.

### WHEN POKKITAPP COLLECTS YOUR INFORMATION

**Registration.** To use the Service to collect Change, you need not create an Account, but you may be required to provide a mobile phone number so that, once you create an Account, we can associate your Balance with your Account. We may also use your device UUID to link this information. To create an Account to view your Balance and initiate Transfers to Linked Entities, you must provide your name, email address, phone number and create a password.

**Linked Entities.** If you link a bank as a Linked Entity, then you will have to submit your bank account information to our service providers in order to facilitate linking.

**Using the Service.** We collect information about your use of the Service. For example, we collect the name of the retailer where you earned Change and the date and location of such retailer. We also collect information about your Account transactions.

**Customer Support.** We may collect information about you through your communications with our customer-support team.

**Location Information.** We collect and store your location information if you enable your mobile device to send it to us, such as by use of geolocation features in the device(s) through which you access the Service, or by inference from other information we collect (for example, your IP address indicates the general geographic region from which you are connecting to the Internet). We use location information to provide you with features, notifications, advertising, or other content that is influenced by your location.

**Information from Third Parties.** We may collect information about you from third parties. For example, we may receive from Linked Entities that are banks information

about where and what you have purchased in the past, your bank account balance, the name of the account, and the date of the balance.

**Cookies, Automatic Data Collection, and Related Technologies.** The Service collects and stores information that is generated automatically as you use it, including your preferences and anonymous usage statistics.

When you visit the Service, we and our third-party service providers receive and record information on our server logs from your browser, including your IP address, and from cookies and similar technology. Our service providers may collect information about your online activities over time and across different online services. Cookies are small text files placed on your computer browser when you visit a website. Most browsers allow you to block and delete cookies. However, if you do that, then the Service may not work properly.

By using the Service, you are authorizing us to gather, parse, and retain data related to the provision of the Service.

## **HOW POKKITAPP USES YOUR INFORMATION**

**Internal and Service-Related Usage.** We use information, including unique identifiers and your location for internal and service-related purposes, such as data analytics, and may share this information with service providers to allow us to provide, maintain, and improve the Service (including to understand and analyze the usage trends and preferences of our users and to develop new products, services, features, and functionality).

**Communications.** We may send email to the email address you provide to us to verify your account and for informational and operational purposes, such as account management, customer service, or system maintenance.

**Marketing.** We and our advertising partners may use information, including your location, device identifiers, and activities on the Service to facilitate transmittal of information (including by push notification) that may be useful, relevant, valuable or otherwise of interest to you.

**Aggregate Data.** We may anonymize and aggregate data collected through the Service and use it for any purpose.

## **POCKITAPP MAY DISCLOSE YOUR INFORMATION**

**To Retailers.** We may provide anonymized information about your shopping habits to retailers where you earn Change. We may also disclose your username to such retailers in order for them to verify transaction reports provided by Pockitapp.

**Linked Entities.** If you initiate a Transfer to a charity, then we will disclose the following information to the applicable charity: the amount of your donation, your name,

your address, and your email address. Charities may use this information to provide tax documentation to you.

**We Use Vendors and Service Providers.** We may share any information that we receive through the Service with vendors and service providers retained in connection with the provision of the Service, including for data analytics and Account maintenance purposes. For example, we share your identity and Account data with Dwolla in order to open and support your Account.

One of the service providers that we use for data analytics is Google Analytics. If you do not want Google Analytics to collect and use information about your use of the Services, then you can install an opt-out in your web browser (<https://tools.google.com/dlpage/gaoptout/>).

**As Required By Law and Similar Disclosures.** We may access, preserve, and disclose your information and/or other account information or content if we believe doing so is required or appropriate to: (i) comply with law enforcement requests and legal process, such as a court order or subpoena; (ii) enforce this Privacy Policy, our Terms, or other agreements; (iii) respond to your requests; or (iv) protect your, our or others' rights, property, or safety.

**Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. The use of your information following any of the foregoing events will be governed by the provisions of the Privacy Policy in effect at the time Pockitapp collected such information.

**With Your Consent.** We may also disclose your information with your permission.

## **CHOICES YOU HAVE WITH YOUR INFORMATION**

**Account Information.** Through your Account settings, you can update some of your personal information, such as your name and email address. You can also contact us at [info@pockitapp.com](mailto:info@pockitapp.com) to update your information.

**Location Information.** You can prevent us from collecting location information from your device by changing the settings on your device; however, if you do not provide us with location information you may not be able to fully use the Service.

**Opt-out.** You can unsubscribe from promotional emails from us via the unsubscribe link provided in the email. Even if you opt out from receiving promotional messages from us, you will continue to receive administrative messages from us.

## **SECURITY OF YOUR INFORMATION**

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us.

## **DO NOT TRACK**

Some web browsers incorporate a “Do Not Track” feature. Because there is not yet an accepted standard for how to respond to Do Not Track signals, our website does not currently respond to such signals.

By using the Service or providing information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Service. If we learn of a security system’s breach, we may attempt to notify you electronically by posting a notice on the Service or sending an e-mail to you. You may have a legal right to receive this notice in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving electronic notice), please notify us at [info@pocketapp.com](mailto:info@pocketapp.com).

## **CHILDREN’S PRIVACY**

We do not knowingly collect, maintain, or use personal information, as defined by the Federal Trade Commission’s Children’s Online Privacy Protection Act (“COPPA”) Rule, from children under 13 years of age, and no part of the Service is directed to children under the age of 13. If you learn that your child has provided us with personal information without your consent, you may alert us at [info@pocketapp.com](mailto:info@pocketapp.com). If we learn that we have collected any personal information from children under 13, then we will promptly take steps to delete such information and terminate the child’s account.

## **INTERNATIONAL USERS**

**If you visit the Service from the European Union or other regions with laws governing data collection and use, then please note that you are agreeing to the transfer of your information to the United States and processing globally. By providing your information to the Service, you consent to any transfer and processing in accordance with this Policy.**

## **CHANGES TO OUR PRIVACY POLICY AND PRACTICES**

**Posting of Revised Privacy Policy.** We will post any adjustments to the Privacy Policy on this web page, and update the “Effective Date” above. If you are concerned about how your information is used, then bookmark this page and read this Privacy Policy periodically. Your continued use of the Service after changes to the Privacy Policy constitutes your acceptance of the new terms of the Privacy Policy.

**New Uses of Information.** From time-to-time, we may desire to use information for uses not previously disclosed in our Privacy Policy. If our practices change regarding previously collected information in a way that would be materially less restrictive than stated in the version of this Privacy Policy in effect at the time we collected the information, then we will make reasonable efforts to provide notice and obtain consent to any such uses as may be required by law.

## **CONTACT INFORMATION**

Pockit Inc.  
4767 New Broad Street  
Orlando, FL 32814

[info@pockitapp.com](mailto:info@pockitapp.com)

## Retailer Privacy Policy

Effective Date: [12-12-17]

Last Updated Date: [12-1-17]

This Retailer Privacy Policy is incorporated by reference into the Pockit Inc. Enterprise License and Equipment Agreement <http://retailer-legal.pockitapp.com/> (the “**License Agreement**”). All other terms not defined in this Retailer Privacy Policy will have the meanings set forth in the License Agreement. The terms “**Pockitapp**,” “**we**,” “**us**,” and “**our**” include Pockit Inc. and our affiliates and subsidiaries. The terms “**you**” and “**your**” refer to Company as defined in the License Agreement. This Privacy Policy applies to the Pockitapp website, related mobile application and any other online services or properties owned or controlled by Pockitapp (collectively, the “**Service**”). This Retailer Privacy Policy explains how Pockitapp may collect, use, and disclose information we obtain from you through the Service.

### WHEN POKKITAPP COLLECTS YOUR INFORMATION

**Registration.** Pursuant to the License Agreement, you may create an account on the Service for the purpose of allowing Customers to collect Change. To create an account on the Service, you may have to provide certain information, such as your business email address, business telephone number, business name, business type, EIN, business website address, and business location address.

**Personal Information.** The individual who establishes your account on the Service (“**Administrator**”) may be required to provide additional personal information, such as a first name, last name, date of birth, and social security number (which is only used for account verification purposes with our service provider, Dwolla). By establishing your account on the Service, the Administrator hereby represents and warrants that he or she has read and agreed to this Retailer Privacy Policy.

**Linked Entities.** If you link a bank account to the Service, then you will have to submit your bank account information to our service providers in order to facilitate the transfer of Change.

**Using the Service.** We collect information about your use of the Service. For example, we collect information about transactions you make through the Service, including the date and location of each transaction.

**Customer Support.** We may collect information about you through your communications with our customer-support team.

**Location Information.** We collect and store your location information if you enable your mobile device or Tablet to send it to us, such as by use of geolocation features in the device(s) through which you access the Service, or by inference from other information we collect (for example, your IP address indicates the general geographic region from which you are connecting to the Internet).

**Information from Third Parties.** We may collect information about you from third parties. For example, we may receive from Linked Entities that are banks information about where and what you have purchased in the past, your bank account balance, the name of the account, and the date of the balance.

**Cookies, Automatic Data Collection, and Related Technologies.** The Service collects and stores information that is generated automatically as you use it, including your preferences and anonymous usage statistics.

When you visit the Service, we and our third-party service providers receive and record information on our server logs from your browser, including your IP address, and from cookies and similar technology. Our service providers may collect information about your online activities over time and across different online services. Cookies are small text files placed on your computer browser when you visit a website. Most browsers allow you to block and delete cookies. However, if you do that, then the Service may not work properly.

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**Marketing.** We and our advertising partners may use information, including your location, device identifiers, and activities on the Service to facilitate transmittal of information (including by push notification) that may be useful, relevant, valuable or otherwise of interest to you.

**Aggregate Data.** We may anonymize and aggregate data collected through the Service and use it for any purpose.

## **POCKITAPP MAY DISCLOSE YOUR INFORMATION**

**To Customers.** We provide Customers with information about the transactions that Customers have entered into with you through the Service, such as your business name and location and the amount of the transaction.

**We Use Vendors and Service Providers.** We may share any information that we receive through the Service with vendors and service providers retained in connection with the provision of the Service, including for data analytics and account maintenance purposes. For clarity, we collect the Administrator's social security number for the sole purpose of sharing it with Dwolla for account verification purposes. Dwolla's use of personal information is subject to its [Privacy Policy](#).

One of the service providers that we use for data analytics is Google Analytics. If you do not want Google Analytics to collect and use information about your use of the Services, then you can install an opt-out in your web browser (<https://tools.google.com/dlpage/gaoptout/>).

**As Required By Law and Similar Disclosures.** We may access, preserve, and disclose your information and/or other account information or content if we believe doing so is required or appropriate to: (i) comply with law enforcement requests and legal process, such as a court order or subpoena; (ii) enforce this Retailer Privacy Policy, the License Agreement, or other agreements; (iii) respond to your requests; or (iv) protect your, our or others' rights, property, or safety.

**Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. The use of your information following any of the foregoing events will be governed by the provisions of the Retailer Privacy Policy in effect at the time Pockitapp collected such information.

**With Your Consent.** We may also disclose your information with your permission.

## **CHOICES YOU HAVE WITH YOUR INFORMATION**

**Account Information.** Through your account settings, you can update some of the information that you have provided to us under this Retailer Privacy Policy. You can also contact us at [info@pockitapp.com](mailto:info@pockitapp.com) to update your information.

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## **DO NOT TRACK**

Some web browsers incorporate a “Do Not Track” feature. Because there is not yet an accepted standard for how to respond to Do Not Track signals, our website does not currently respond to such signals. If we learn of a security system’s breach, we may attempt to notify you electronically by posting a notice on the Service or sending an e-mail to you.

By using the Service or providing information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Service.

## **CHANGES TO OUR RETAILER PRIVACY POLICY AND PRACTICES**

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